

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN MOYA
YRAPURA; ROSA ELENA AMAYA; and
HERBERT DAVID SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK LIMITED
PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and A.J.
DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16cv00563-TSE-TCB

NOTICE OF PLAINTIFFS' MOTION TO FILE DOCUMENTS UNDER SEAL

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolaños, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz ("Plaintiffs") are filing a Motion to File Documents under Seal ("Motion"). In support of this Motion, Plaintiffs are submitting a Non-Confidential Memorandum in Support of Plaintiffs' Motion to File Documents under Seal, along with this Notice and a Proposed Order.

This document serves as notice to the public that Plaintiffs, by counsel, have moved the Court to seal from public disclosure Exhibits 1 and 3 to Plaintiffs' Memorandum in Opposition to Defendants' Motion for Summary Judgment (the "Opposition Brief"), as well as portions of Plaintiffs' Opposition Brief which reference the parties' prior settlement agreement and quote

sealed exhibits that are already part of the record. A brief description of the content of the documents Plaintiffs request to file under seal is as follows:

- Ex. 1: Plaintiff Rosa Elena Amaya's confidential responses to Defendants' interrogatories.
- Ex. 3: Confidential excerpts from the deposition transcript of Defendants' designated 30(b)(6) deponent.¹

The Opposition Brief also either quotes from or references the following confidential documents:

- Dkt. No. 138, Ex. 21: Confidential excerpts from the deposition transcript of Defendants' designated 30(b)(6) deponent.
- Dkt. No. 138, Ex. 27: Confidential excerpts from the deposition transcript of Carolina Easton.
- Dkt. No. 138, Ex. 43: Confidential Consumer Reports and CoreLogic SafeRent Training Manual.
- Confidential settlement agreement.

Objections to this Motion to File Documents Under Seal should be filed in the Civil Section of the Clerk's Office of this Court. This Notice will be posted for a minimum of 48 hours.

¹ Although Defendants did not mark their deposition transcripts as confidential, Plaintiffs file these transcripts under seal out of an abundance of caution.

Respectfully submitted,

//s//

Dated: October 25, 2019

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of October, 2019, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

_____/s/_____
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